

MAZIE SLATER KATZ & FREEMAN, LLC

103 Eisenhower Parkway, Suite 207, Roseland, NJ 07068

Phone: (973) 228-9898 - Fax: (973) 228-0303

www.mazieslater.com

David A. Mazie*
Adam M. Slater*[°]
Eric D. Katz*[°]
David M. Freeman
Beth G. Baldinger
Matthew R. Mendelsohn*[°]
David M. Estes
Adam M. Epstein[°]

*Certified by the Supreme Court of
New Jersey as a Civil Trial Attorney

Karen G. Kelsen[°]
Cory J. Rothbort*[°]
Michael R. Griffith[°]
Christopher J. Geddis
Samuel G. Wildman
Julia S. Slater[°]
Trevor D. Dickson

[°]Member of N.J. & N.Y. Bars

February 21, 2025

Via ECF

Honorable Thomas I. Vanaskie, Special Master
Stevens & Lee, P.C.
1500 Market Street, East Tower, 18th Floor
Philadelphia, Pennsylvania 19103

Re: *In re Valsartan, Losartan, and Irbesartan Products Liability
Litigation*, No. 1:19-md-02875 (D.N.J.)

Dear Judge Vanaskie:

I am writing on behalf of the Plaintiffs to provide a status report on Plaintiffs' efforts to reach a stipulation with ZHP as to the contents of certificates of analysis and material safety data sheets that were provided to ZHP by its suppliers with regard to the contents and properties of the key solvents, DMF, TEA, and TEA HCL, which were not produced during the course of discovery. These are the solvents that were substituted into the manufacturing process by ZHP and led to the formation of NDMA and NDEA.

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The Parties had made significant progress in narrowing their differences, unfortunately based on a development today, the parties may be at an impasse. Plaintiffs have made one last effort to bridge the gap between the Parties and hope to have an answer from ZHP on Monday. If agreement cannot be reached, Plaintiffs will request a briefing schedule to seek relief. We will update the Court as soon as we hear from ZHP.

Thank you for your courtesies and consideration.

Respectfully,

A handwritten signature in blue ink, appearing to read 'Adam M. Slater', written over a horizontal line.

Adam M. Slater
Plaintiffs' Liaison Counsel

Cc: Counsel of record (via ECF)